

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

RIPPLE ANALYTICS INC.,

Plaintiff and Counterclaim Defendant,

- against -

PEOPLE CENTER, INC. d/b/a RIPPLING,

Defendant and Counterclaim Plaintiff.

Civ. Action No. 2:20-cv-00894  
(GRB)(ARL)

**DECLARATION OF  
DYAN FINGUERRA-DUCHARME**

DYAN FINGUERRA-DUCHARME, declares as follows:

1. I am an attorney licensed to practice before the courts of the State of New York and the United States District Court for the Eastern District of New York. I am a partner at the law firm Pryor Cashman LLP (“Pryor Cashman”).

2. I respectfully submit this declaration, pursuant to Local Civil Rule 1.4 of the United States District Court for the Eastern District of New York, in support of my Motion for Leave to Withdraw as Attorney of Record (the “Motion”) for plaintiff Ripple Analytics Inc. (“Plaintiff”).

3. The reason for this Motion is that after consultation with Plaintiff it was decided that its best interests would be served by the retention of new counsel. Plaintiff accordingly has chosen to retain Leason Ellis LLP as successor counsel to Pryor Cashman LLP.

4. Plaintiff has agreed to my withdrawal as counsel in this matter.

5. We have conferred with counsel for Defendant who has stated that Defendant does not object to this Motion.

6. This Motion is being served on Defendant via ECF. Prior to filing on ECF, a copy of this Motion and Declaration was provided to Plaintiff’s principal, Mr. Noah Pusey, via email.

7. The parties are presently in discovery, with all discovery to be completed by March 12, 2021, pursuant to the Scheduling Order in the case (ECF No. 15).

8. I am not, and, to the best of my knowledge, Pryor Cashman is not, asserting a retaining or charging lien.

9. I respectfully submit that the withdrawal of counsel will not unnecessarily delay this action or prejudice any party, and therefore respectfully request that the Court grant the Motion.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
August 25, 2020

/s/ Dyan Finguerra-DuCharme  
DYAN FINGUERRA-DUCHARME